

(Del. Rev. 11/14) Pro Se General Complaint Form

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RACQUEL LEWIS

(In the space above enter the full name(s) of the plaintiff(s).)

23 - 296

Civ. Action No.

(To be assigned by Clerk's
Office)

-against-

Tyler Technologies

COMPLAINT
(Pro Se)

Jury Demand?

☒ Yes

☐ No

(In the space above enter the full name(s) of the defendant(s).)

If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section I. Do not include addresses here.)

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

If this is an employment discrimination claim or social security claim, please use a different form.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

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I. PARTIES IN THIS COMPLAINT**Plaintiff**

List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff:

RACQUEL LEWIS

Name (Last, First, MI)

30 Caleb Terrace

Street Address

Wilmington DE

County, City

State

19805

Zip Code

302.521.0271

Telephone Number

E-mail Address (if available)

Defendant(s)

List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant 1:

Tyler Technologies

Name (Last, First)

5101 Tennyson Pkwy

Street Address

Plano

County, City

Texas

State

75024

Zip Code

Defendant 2:

Name (Last, First)

Street Address

County, City

State

Zip Code

(Del. Rev. 11/14) Pro Se General Complaint Form

Defendant(s) Continued

Defendant 3:

Name (Last, First)

Street Address

County, City

State

Zip Code

Defendant 4:

Name (Last, First)

Street Address

County, City

State

Zip Code

II. BASIS FOR JURISDICTION*Check the option that best describes the basis for jurisdiction in your case:*

- ☐ **U.S. Government Defendant:** United States or a federal official or agency is a defendant.
- ☒ **Diversity of Citizenship:** A matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000.
- ☐ **Federal Question:** Claim arises under the Constitution, laws or treaties of the United States.

If you chose "Federal Question", state which of your federal constitutional or federal statutory rights have been violated.

ECPA, SCA computer violations
 California Code Sec. 1798.80
 Violation of Privacy - Intrusion upon seclusion
 CCPA - Data Protection Law
 Obstruction to Justice

(Del. Rev. 11/14) Pro Se General Complaint Form

III. VENUE

This court can hear cases arising out of the Counties of New Castle, Kent, and Sussex in the State of Delaware.

Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.

Venue is appropriate in this Court because:

I live in the State of Delaware.
The event happened in Wilmington
Delaware.

IV. STATEMENT OF CLAIM

Place(s) of
occurrence:

Wilmington DE

Date(s) of occurrence:

Dec. 15, 16, 17-2023

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions.

FACTS:

What
happened to
you?

Tyler Technologies blocked
my online submission to
Maryland Courts.

(Del. Rev. 11/14) Pro Se General Complaint Form

Was anyone
else
involved?

Just myself

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Who did
what?

Tyler Technologies blocked
my online submission to
Maryland courts.

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V. INJURIES

If you sustained injuries related to the events alleged above, describe them here.

Increased Anxiety
Mental Anguish

VI. RELIEF

The relief I want the court to order is:

☒ Money damages in the amount of: \$ 200,000.00

☒ Other (explain):

Complete End to all cyber
and other forms of blocks
harassment and bullying.

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VII. CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; and (3) complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

3/17/2023

Dated



Plaintiff's Signature

RACQUEL LEWIS

Printed Name (Last, First, MI)

30 Caleb Terrace Wilmington DE 19805

Address

City

State

Zip Code

302.521.0271

Telephone Number

E-mail Address (if available)

List the same information for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

23 - 296

March 15, 2023

Tyler Technologies
Anne Cathy
5101 Tennyson Pkwy
Plano, Texas 75024

FILED
U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2023 MAR 17 PM 3:19

RE: Blocked Court Submission

1. Dec. 15, 2022 Tyler tech. cloud blocked my court claim while using Maryland online courts submission portal
2. When the account was made I was blocked with an error message before creating a password. "an error occurred while retrieving contextual help".
3. Several attempts were made on several days online. No resolve even after phone calls instructed me to create a new account with a new username. Even as I never got pass making a password for the first account.

4- I have been blocked by Tyler Tech.
Maryland. tyler-tech.cloud

Cause of Action

Blocked by Tyler technology's
client department of Education.

Remedy

\$200,000 (Two Hundred Thousand)

Injury

mental anguish / increased anxiety
Property Damage

Violations

- Obstruction to Justice
- ECPA including SCA
- Violation of Privacy - Intrusion upon Seclusion
- CCPA - DATA Protection Law
California Code Sec 1798.80
- Cyber Harassment
- Interstate Harassment